

DISCOVERY PLAN WORKSHEET

Tier I Pre-Settlement Discovery

Deadline for completion of Rule 26(a) initial disclosures
and HIPAA-complaint records authorizations: 2/28/2022

Completion date for Phase I Discovery
as agreed upon by the parties: March 21, 2022
*(Reciprocal and agreed upon document production,
generally not including depositions, unless otherwise agreed.
No more than 30 days after Initial Conference)*

Status conference TBD by the court: _____
(Generally 15 days post Tier I Discovery)

Tier II Discovery and Motion Practice

Motion to join new parties or amend the pleadings: April 20, 2022
(Presumptively 15 days post status conference)

First requests for production of documents
and for interrogatories due by: May 5, 2022
(Presumptively 15 days post joining/amending)

All fact discovery completed by: August 19, 2022
*(Presumptively 3.5 months post first
requests for documents/interrogatories)*

Exchange of expert reports completed by: September 19, 2022
(Presumptively 30 days post fact discovery)

Expert depositions completed by: October 19, 2022
(Presumptively 30 days post expert reports)

Final date to take first step in dispositive motion practice: November 21, 2022
*(Parties are directed to consult the District Judge's
individual rules regarding such motion practice.
Presumptively 30 days post expert depositions)*

Submission of joint pre-trial order: December 21, 2022

Final Pre-Trial Conference TBD by the court: